

REMARKS

In light of the above the amendatory matter and remarks to follow, reconsideration and allowance of this application are respectfully solicited.

Claims 57-63 remain in this application. Claims 57-63 are amended to emphasize the distinction between Applicant's invention and the cumulative teachings of the references relied upon in the Office Action under reply.

As was done in the previous Office Action of April 21, 2009, U.S. Patent 6,157,934 (Khan) was combined with Enami (Image Processing in Program Production – DTPP: Desk Top Program Production), but now U.S. Patent 6,088,702 (Plantz) was added to the Kahn-Enami combination to reject claims 57, 58 and 61. U.S. Published Application 2005/0055239 (Farmer) was added to the Kahn-Enami-Plantz combination to reject claims 59 and 62. U.S. Patent 6,212,549 (Page) was added to the Khan-Enami-Plantz combination to reject claims 60 and 63. Accordingly, all claims 57-63 were rejected in view of prior art. It is respectfully submitted that claims 57-63, as presented herein, are patentably distinct over the combination of Khan, Enami and Plantz, whether or not supplemented by Farmer and/or Page.

The Examiner is quite familiar with the subject matter of the rejected claims, particularly as these claims were discussed in the Remarks sections of prior amendments. Rather than repeat the discussion of prior amendments, it should be sufficient to point out that Claim 57 is directed to a video program production system in which updated composition table data is provided to all of the terminals included in the system, with the thus-provided composition table data "describing tasks to be performed and tasks completed by said different operating groups for viewing at each terminal." Thus, each terminal displays tasks associated not only with the tasks to be performed by the group associated with that terminal, but also the tasks to be performed by

other, different groups in accordance with the production schedule and instructions in the composition table for producing a video program.

Turning to the specific recitations of claim 57, this claim recites, *inter alia*:

storage means [at the composition table site] for storing composition table data containing updatable information describing successive tasks to be performed and completed by different ones of said operating groups required for the production of said video program, said composition table data storing said video program production schedule and said instructions for the respective operating groups, ...

control means for providing the composition table data to each of the terminals, including the information describing tasks to be performed and tasks completed by said different operating groups for viewing at each terminal, ...

each terminal comprises ...

display means for displaying the composition table data ..., including the tasks to be performed and the tasks completed by respective groups, such that the display means at the terminal of one operating group displays the tasks completed by said one operating group as well as the tasks completed by other operating groups,

input information generating means for generating information to be input to said composition table, said input information including end of task data representing the completion of the task performed by the operating group associated with said terminal,

... update the composition table that is stored at the composition table site and that is displayed at all of the terminals,

whereby the display at a terminal associated with one operating group of said end of task data input in said composition table data from a different operating group instructs said one group to perform the next successive task in the work assignment performed by said one group following the task in the production schedule that has been completed by said different operating group, as determined by said composition table.

As the Examiner recognizes, Khan does not describe a "video program production system," as called for by claim 57 (and also by claims 58-60) of the present application. Nor does Kahn describe a composition table that stores the video program production schedule and instructions for the operating groups in the video program production system. Rather, the

Examiner interprets the various spreadsheets in Khan as corresponding to Applicant's claimed composition table. Khan prepares a master spreadsheet that is displayed only at the server computer (client computers "display and message only the parts of the workflow data which are relevant to the user ... at that client computer" [col. 2, lines 23-28 of Kahn]). Individual pieces of the master spreadsheet are generated from client computers, which the Examiner interprets as corresponding to Applicant's claimed operating group terminals. However, it is a significant feature of Khan to limit the display at each client computer only to the specific tasks that can be performed at that client computer. As stated at column 4, lines 19-21 of Khan, "The user therefore does not see and is unable to change any of the cells other than those which are linked to the form." Also, at column 5, lines 45-47, Khan states, "Multiple, client spreadsheets display and message only the parts of the workflow data which is relevant to the client user." Again, at column 5, lines 53-55, Khan states, "the use of electronic forms at each client computer... displays only the relevant parts of the spreadsheet to the client user." (Emphasis added.) Thus, Khan's master spreadsheet is not available to or displayed at each client computer. Rather, only the discrete portion of the master spreadsheet on which the client works is displayed at the client computer. Tasks associated with different clients are not displayed at any other client computer. This is quite different from the system of Applicant's claim 57 in which each terminal displays tasks associated not only with that terminal itself, but also with tasks associated with different terminals. In claim 57, each terminal includes:

display means for displaying the composition table data ... including the tasks to be performed and the tasks completed by respective groups, such that the display means at the terminal of one operating group displays the tasks completed by said one operating group as well as the tasks completed by other operating groups.

Claim 57 also defines each terminal in the video program production system, resulting in, "the terminals operated by all of said operating groups display the composition table updated by

different ones of said operating groups and thereby the status of all of said operating groups."

Each terminal in Applicant's claim 57 displays the composition table updated by different ones of the operating groups -- as opposed to Khan, in which only the small portion of the spreadsheet that a client computer is permitted to update is displayed at a client computer. Khan does not permit all the client computers to display the master spreadsheet that may be updated by different clients.

The terminal recited in Applicant's claim 57 also displays the end of task data input into the composition table from an operating group to instruct a different operating group to perform the next successive task following the task that has been completed by the inputting operating group:

whereby the display at a terminal associated with one operating group of said end of task data input in said composition table data from a different operating group instructs said one group to perform the next successive task in the work assignment performed by said one group following the task in the production schedule that has been completed by said different operating group, as determined by said composition table.

By reason of Khan's restriction on what can be displayed at the respective client computers, the completion of the task by one client is not displayed to another and, thus, that other client is not instructed as a result of this nonexistent display to perform the next successive task.

It is respectfully submitted, the addition of Enami to Khan does not cure the aforementioned deficiencies found in Khan. Enami is relied upon for its description of video program production and a video program database. Assuming the spreadsheet of Khan is replaced by video production data, as proposed by the Examiner's rejection, the result still would not permit a given client computer to display the tasks to be performed by other clients. Nor would all of Khan's client computers display video program production information updated by different clients, thereby displaying the status of all of the clients in the system. Furthermore, there is nothing in

Kahn or Enami that would suggest instructing one group to perform the next task in the composition table work assignment when the task in the production schedule is completed by a different group, as recited in claim 57.

Of course, claim 57 is rejected as being obvious in view of the combination of Kahn, Enami and Plantz. The Office Action under reply contends that Plantz provides for different operating groups to view tasks completed by other operating groups at each terminal (see page 4 of the Office Action). The Office Action further argues that Plantz discloses that the terminals operated by all of the operating groups display the composition table updated by different ones of the operating groups; and that the display at a terminal that a group has completed a task instructs a different group to perform the next successive task (see the first two paragraphs at page 5 of the Office Action). The Examiner kindly pointed to column 9, lines 15-67, column 7, lines 28-63 and column 10, lines 1-29 of Plantz as support for this argument. Applicant's representative respectfully disagrees with this argument.

Plantz teaches that each of his terminals operates on a specific portion of a project, and only an administrator's terminal can display all of the authoring or editing inputs, as described at the following portions of Plantz:

From the top-level 101 of the GPS, users select from among a menu of document project(s) (102, 103, 104) to which that author or editor has previously received access authorization. (Col. 8, lines 20-23).

Once the appropriate subtopic has been selected 111 or a menu of search results is returned from execution of an appropriate search 116, the user who is an editor or author of a certain document selects 120 the section, subtopic or book on which he or she is working. (Col. 8, lines 52-56).

Upon providing the required log-in data, a log-in selection 143 executes the log-in command, and if approved username and password data are supplied by the user, access to a menu of topics, subtopic, or chapters 151, 152, 153 for which the author is authorized to contribute is provided 150, along with a selection 154 to view or edit the selected document ... (Col. 9, lines 26-32).

The entire GPS is administered by a system administrator. As with editors or authors, as described above, the system administrator selects a book or project to review. However, by virtue of the administrator having been given administrative authority in the initial set-up of the GPS, upon selection of a book or project, the administrator invokes the GPS Administrative Control Center 300 ... (Col. 10, line 63 to col. 11, line 3).

... 307 calls up a summary of the status of each available chapter within a project; 308 lists the progress of any aspects of the project to which authors or editors have yet to be assigned ... (Col. 11, lines 18-21).

Plantz further teaches that once editing is complete, the document can be viewed, but the document is displayed only to the user who is performing the editing operation -- other users are not provided with the display of task completed by other groups that are performing different operations in the project. Nor does Plantz describe a display that instructs a group to perform a successive task in the work assignment described in a composition table when a different group completes a previous task in the work assignment. Thus, Plantz is similar to Kahn, discussed above.

Therefore, since significant recitations of claim 57 find no correspondence in the cumulative teachings of Kahn, Enami and Plantz, claim 57 is unobvious and the rejection thereof should be withdrawn.

Claims 58 and 61 were rejected for substantially the same reasons as claim 57. But, claims 58 and 61 recite features that are quite similar to the features of claim 57, discussed above. Namely,

display means for displaying the composition table data ... including the tasks to be performed and the tasks completed by respective groups, such that the display means at the terminal of one operating group displays the tasks completed by said one operating group as well as the tasks completed by other operating groups.

whereby the display at a terminal associated with one operating group of said end of task data input in said composition table data from a different operating group instructs said

one group to perform the next successive task in the work assignment performed by said one group following the task in the production schedule that has been completed by said different operating group, as determined by said composition table.

Accordingly, claims 58 and 61 are patentably distinct over the combination of Khan, Enami and Plantz for those reasons argued above.

Claims 59 and 62 were rejected as being obvious in view of the combination of Khan, Enami, Plantz and Farmer. But, these claims recite features similar to the aforequoted features discussed above in connection with the rejection of claims 57, 58 and 61. Thus, according to these claims, a group will display the resultant composition table even as that table is updated by a different group. As discussed previously, Khan does not permit this. Enami was cited for his description of video program production. Plantz isolates users so that a user can observe only his portion of a project. Farmer was relied upon for describing authorized groups to access and update only certain items. But, as was pointed out in Applicant's previous amendment, Farmer is directed to an aircraft maintenance system in which a database supplies maintenance function information to an electronic package that is printed out for maintenance personnel to perform specific tasks. Once a task is completed and approved by a manager, information on that task is stored. When a worker logs into a terminal and enters his ID, a maintenance server determines the task for which that worker is certified to perform, and the electronic package delineating the task is displayed on the worker's terminal (paragraph [0032] of Farmer). An electronic record of the work that is completed and authorized is maintained (Fig. 4 and paragraphs [0049], [0050] and [0053]). There is no suggestion of displaying the electronic package or the electronic record to all terminals. Thus, Farmer fails to cure the aforementioned deficiencies in the Khan-Enami-Plantz combination.

Accordingly, withdrawal of the rejection of claims 59 and 62 as being obvious is respectfully solicited.

Finally, claims 60 and 63 were rejected as being obvious in view of the combination of Khan, Enami, Plantz and Page. These claims recite features similar to those quoted above. That Khan, Enami and Plantz do not disclose these features has been discussed previously. Page was relied upon for describing edit information. However, even if Page is added to the combination of Khan, Enami and Plantz, the resultant still would not teach:

display means for displaying the composition table data ... including the tasks to be performed and the tasks completed by respective groups, such that the display means at the terminal of one operating group displays the tasks completed by said one operating group as well as the tasks completed by other operating groups.

whereby the display at a terminal associated with one operating group of said end of task data input in said composition table data from a different operating group instructs said one group to perform the next successive task in the work assignment performed by said one group following the task in the production schedule that has been completed by said different operating group, as determined by said composition table.

Accordingly, it is respectfully requested that the rejection of claims 60 and 63 as being obvious in view of the combination of Khan, Enami, Plantz and Page be withdrawn.

Applicant's representative repeats the argument raised in the previous amendment, namely, the respective references which have been combined and applied against the claims of the present application are from disparate, unrelated arts. There is no motivation, suggestion or underlying reason to combine the spreadsheet assembly system of Khan with the video production system of Enami with the text editing system of Plantz with the aircraft maintenance system of Farmer with the editing of Page. There is no reason to combine these references in the manner attempted in the office action under reply.

As stated in Applicant's previous amendment, it is respectfully submitted the Examiner has used Applicant's claims as a guide to reconstruct the prior art by assembling individual, unrelated bits and pieces. It is improper to use the hindsight gained from Applicant's specification, and then use that hindsight to reassemble the prior art in an effort to reject Applicant's claims. The only motivation to use these references in the manner attempted by the Examiner is provided solely by Applicant himself. The Court of Appeals for the Federal Circuit, as well as its predecessor court, has long held that obviousness cannot be established by combining the teachings of the prior art to produce the claimed invention, absent some teaching, suggestion or incentive supporting the combination. Although *KSR* has relaxed the standard for combining multiple references, it still is impermissible to use Applicant's claims as a frame and the prior art references as a mosaic to piece together a facsimile of the claimed invention. But that is precisely what has been done in the present case. Accordingly, the rejection of claims 57-63 should be withdrawn.

Since the cumulative teachings of the prior art that has been applied against Applicant's claims fail to disclose all of the limitations recited by those claims, claims 57-63 are unobvious and are in condition for allowance.

Statements appearing above in respect to the disclosures in the cited references represent the present opinions of the undersigned attorney and, in the event the Examiner disagrees with any of such opinions, it is respectfully requested that the Examiner specifically indicate those portions of the references providing the basis for a contrary view.

Please charge any additional fees that may be needed, and credit any overpayment, to our
Deposit Account No. 50-0320.

Respectfully submitted,

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